

1 Alan M. Fisch (*pro hac vice*)
2 *alan.fisch@fischllp.com*
3 R. William Sigler (*pro hac vice*)
4 *bill.sigler@fischllp.com*
5 Adam A. Allgood (SBN: 295016)
6 *adam.allgood@fischllp.com*
7 FISCH SIGLER LLP
8 5301 Wisconsin Avenue NW
9 Fourth Floor
10 Washington, DC 20015
11 Tel: 202.362.3500
12 Fax: 202.362.3501

13 Ken K. Fung (SBN: 283854)
14 *ken.fung@fischllp.com*
15 FISCH SIGLER LLP
16 400 Concar Drive
17 San Mateo, CA 94402
18 Tel: 650.362.8207
19 Fax: 202.362.3501

20 Counsel for Plaintiffs
21 Juniper Networks, Inc.
22 and Apstra, Inc.

Leo R. Beus (*pro hac vice*)
Michael K. Kelly (*pro hac vice*)
K. Reed Willis (*pro hac vice* pending)
BEUS GILBERT PLLC
Attorneys at Law
701 North 44th Street
Phoenix, Arizona 85008-6504
Telephone: (480) 429-3000
Facsimile: (480) 429-3001
Email: lbeus@beusgilbert.com
mkelly@beusgilbert.com
rwillis@beusgilbert.com

Allan Steyer (SBN: 100318)
Suneel Jain (SBN: 314558)
STEYER LOWENTHAL BOOD-
ROOKAS ALVAREZ & SMITH LLP
235 Pine Street, 15th Floor
San Francisco, California 94104
Telephone: (415) 421-3400
Facsimile: (415) 421-2234
Email: asteyer@steyerlaw.com
sjain@steyerlaw.com

Counsel for Defendant
Swarm Technology LLC

23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 JUNIPER NETWORKS, INC. and
APSTRA, INC.,

Plaintiffs,

v.

SWARM TECHNOLOGY LLC,

Defendant.

CASE NO. 3:20-cv-03137-JD

**JOINT STIPULATION EXTENDING
DEADLINES FOR FILING
RESPONSE AND REPLY TO MOTION
TO DISMISS**

Pursuant to Civil Local Rules 6-2(a) and 7-12, Plaintiffs, Juniper Networks, Inc. and Apsara, Inc. (collectively “Juniper”), and Defendant, Swarm Technology LLC (“Swarm”), stipulate, subject to the Court’s approval, to extend the deadline for Juniper to file its Response to Swarm’s Motion to Dismiss (Dkt. No. 39) from April 30, 2021 to May 21, 2021 and the date for Swarm to file its Reply in support of its Motion to Dismiss from May 7, 2021 to May 28, 2021. The parties also stipulate, subject to the Court’s approval, that the hearing on Swarm’s motion to dismiss be held on June 10, 2021 at 10:00 am.

The parties respectfully request that the Court extend these deadlines to allow for jurisdictional and venue discovery that Juniper asserts is relevant to the motion to dismiss. The parties have agreed to the following limitations on venue and jurisdictional discovery, which shall be completed by May 14, 2021.

- Three interrogatories related to venue and jurisdictional issues, and
- A four-hour deposition of Swarm’s corporate representative Alfonso Iniguez in his personal capacity and as a 30(b)(6) witness related to venue and jurisdictional issues.

No other deadlines will be impacted by this extension of time. The parties have previously stipulated to two extensions for Swarm to respond to Juniper’s original complaint (Dkt. Nos. 16-17) and an extension for Juniper to respond to Swarm’s original motion to dismiss (Dkt. No. 21).

Accordingly, the parties respectfully request that the Court enter this stipulation.

Respectfully submitted,

Dated: April 29, 2021

By: /s/ R. William Sigler

R. William Sigler

Counsel for Plaintiffs

JUNIPER NETWORKS, INC. and APSTRA, INC.

Dated: April 29, 2021

By: /s/ Suneel Jain

Suneel Jain

Counsel for Defendant

SWARM TECHNOLOGY LLC

Filer's Attestation: I attest that counsel for the parties have concurred in this filing.

/s/ R. William Sigler

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: May 5, 2021

/s/

